



1001 Noble Energy Way  
Houston, Texas 77070  
281.872.3100

October 26, 2017

Administrator  
Colorado Department of Public Health and Environment  
Air Pollution Control Division  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

RECEIVED

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Office of Environmental  
Compliance & Environmental Justice

Doug Benevento, Regional Administrator  
USEPA Region 8  
1595 Wynkoop Street  
Mailcode 8ENF-AT  
Denver, Colorado 80202-1129

**RE: NSPS OOOOa Annual Report**  
**Reporting Period: August 2, 2016 through August 2, 2017**  
**COLORADO RIVER DEVCO LLP**  
**Colorado Assets**

Dear Administrator:

On behalf of COLORADO RIVER DEVCO LLP, and as required by 40 CFR §60.5420a(b) of the federal New Source Performance Standards Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, I am submitting the enclosed Annual Report for the company's onshore midstream assets located in Colorado. This report covers the reporting period August 2, 2016 through August 2, 2017.

Only one facility, a reciprocating compressor affected facility, is subject to NSPS OOOOa for this reporting period.

Please do not hesitate to contact me at 720-987-8065 or [gregg.wurtz@nblenergy.com](mailto:gregg.wurtz@nblenergy.com) if you should have any questions.

Sincerely,

(b) (6)

Gregg Wurtz  
Air Quality Compliance Manager  
Noble Energy Inc.  
Greely, Colorado

COLORADO RIVER DEVCO LP

By: Colorado River DevCo GP LLC, its general partner

By: Noble Midstream Services, LLC, its sole member

cc: John Nicholson, COLORADO RIVER DEVCO LP  
Brian Taylor, Noble Energy, Inc.



**I. General Information [§60.5420a(b)(1)]**

Company Name:	Noble Midstream Services
Address:	1001 Noble Energy Way Houston, TX 77070
Assets Covered:	Colorado midstream sites

Affected Facilities:	Included in this Report?
Well affected facility [§60.5365a(a)]	No
Centrifugal compressor affected facility [§60.5365a(b)]	No
Reciprocating compressor affected facility [§60.5365a(c)]	Yes
Pneumatic controller affected facility [§60.5365a(d)]	No
Storage vessel affected facility [§60.5365a(e)]	No
The group of all equipment within a process unit at onshore natural gas processing plant [§60.5365a(f)]	No
Sweetening units at onshore natural gas processing plants [§60.5365a(g)]	No
Pneumatic pump affected facility [§60.5365a(h)]	No
Collection of fugitive emissions components at a well site [§60.5365a(i)]	No
Collection of fugitive emissions components at a compressor station [§60.5365a(j)]	No

Reporting Period Start:	8/2/2016
Reporting Period End:	8/2/2017

Responsible Official Certification Statement
Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

John Nicholson Chief Operating Officer		10/24/2017
Responsible Official Name and Title (Printed)	Responsible Official Signature	Date

## II. Well Affected Facilities [§60.5420a(b)(2)]

### **Affected Facility:**

*Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing. [§60.5365a(a)]*

### **Reporting Requirements**

Not applicable. COLORADO RIVER DEVCO LLP does not operate any well affected facilities at its Colorado assets.

## III. Centrifugal Compressor Affected Facilities [§60.5420a(b)(3)]

### **Affected facility**

*Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.*

*Centrifugal compressor means any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors for the purposes of this subpart [§60.5430a].*

### **Reporting Requirements**

Not applicable. COLORADO RIVER DEVCO LLP does not operate any centrifugal compressor affected facilities at its Colorado assets.

#### IV. Reciprocating Compressor Affected Facilities [§60.5420a(b)(4)]

##### Affected facility

*Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart [§60.5365a(c)].*

##### Reporting Requirements

*The cumulative number of hours of operation or the number of months since the initial startup, since September 18, 2015, or since the previous reciprocating compressor rod packing replacement, whichever is later [§60.5420a(b)(4)(i)]*

**Table 2. Reciprocating Compressor Rod Packing Replacement Monitoring [§60.5420a(b)(4)(i)]**

Facility ID	Compressor ID * (§60.5420a(b)(1)(ii))	Are emissions from the rod packing unit being routed to a process through a closed vent system under negative pressure? * (§60.5420a(b)(4)(i))	If emissions are not routed to a process through a closed vent system under negative pressure, what are the cumulative number of hours or months of operation since initial startup or the previous rod packing replacement (whichever is later)? * (§60.5420a(b)(4)(i))	Units of Time Measurement * (§60.5420a(b)(4)(i))	Cumulative hour Deviations where the reciprocating compressor was not operated in compliance with requirements* (§60.5420(b)(4)(ii) and §60.5420a(c)(3)(iii))
Lilli Gas Plant	4ZS00494	No	11	Months	None

## V. Pneumatic Controller Affected Facilities [§60.5420a(b)(5)]

### Affected Facility

*(1) For the oil production segment (between the wellhead and the point of custody transfer to an oil pipeline), each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh.*

*(2) For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants), each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh [§60.5365a(d)].*

### Reporting Requirements

*A. An identification of each pneumatic controller constructed, modified, or reconstructed during the reporting period, including the identification information specified in §60.5390a(b)(2) or (c)(2) [§60.5420a(b)(5)(i)]*

**Not applicable. COLORADO RIVER DEVCO LLP did not install any continuous high bleed natural gas-driven pneumatic controller affected facilities during the Reporting Period at its Colorado assets.**

*B. If applicable, documentation that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than 6 standard cubic feet per hour are required and the reasons why [§60.5420a(b)(5)(ii)].*

**Not applicable. COLORADO RIVER DEVCO LLP does not use any continuous high bleed natural gas-driven pneumatic controller affected facilities at its Colorado assets.**

*C. Records of deviations specified in §60.5420a (c)(4)(v) that occurred during the reporting period [§60.5420a(b)(5)(iii)]*

**Not applicable. COLORADO RIVER DEVCO LLP does not use any continuous high bleed natural gas-driven pneumatic controller affected facilities at its Colorado assets.**

## VI. Storage Vessel Affected Facilities [§60.5420a(b)(6)]

### Affected Facility

*Each storage vessel affected facility, which is a single storage vessel with the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section. The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in this subsection. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a federal, state, local or tribal authority. [§60.5365a(e)].*

### Reporting Requirements

- A. *An identification, including the location, of each storage vessel affected facility for which construction, modification or reconstruction commenced during the reporting period. The location of the storage vessel shall be in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983 [§60.5420a(b)(6)(i)].*

*Documentation of the VOC emission rate determination according to § 60.5365(e) [§60.5420a(b)(6)(ii)].*

**Not applicable. COLORADO RIVER DEVCO LLP did not construct, modify, or reconstruct any storage vessel affected facilities during the reporting Period at its Colorado assets.**

- B. *Records of deviations specified in §60.5420a (c)(5)(iii) that occurred during the reporting period [§60.5420(b)(6)(iii)]*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any storage vessel affected facilities during the reporting Period at its Colorado assets.**

- C. *A statement that you have met the requirements specified in §60.5410(h)(2) and (3) [§60.5420(b)(6)(v)]*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any storage vessel affected facilities during the reporting Period at its Colorado assets.**

*D. You must identify each storage vessel affected facility that is removed from service during the reporting period as specified in §60.5395a(c)(1)(ii), including the date the storage vessel affected facility was removed from service [§60.5420a(b)(6)(v)].*

*You must identify each storage vessel affected facility returned to service during the reporting period as specified in §60.5395a(c)(3), including the date the storage vessel affected facility was returned to service. [§60.5420a(b)(6)(vi)].*

*If complying with §60.5395a(a)(2) with a control device tested under §60.5413a(d) which meets the criteria in §60.5413a(d)(11) and §60.5413a(e), records specified in paragraphs (c)(5)(vi)(A) through (F) of this section for each storage vessel constructed, modified, reconstructed or returned to service during the reporting period. [§60.5420a(b)(6)(vii)]*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any storage vessel affected facilities during the reporting Period at its Colorado assets.**

## **VII. Collection of Fugitive Emissions components at each Well Site and Compressor Station [§60.5420a(b)(7)]**

### **Affected Facility – Well Site**

*One or more surface sites that are constructed for the drilling and subsequent operation of any oil well, natural gas well, or injection well. For purposes of the fugitive emissions standards at §60.5397a, well site also means a separate tank battery surface site collecting crude oil, condensate, intermediate hydrocarbon liquids, or produced water from wells not located at the well site (e.g., centralized tank batteries). [§60.5430a].*

*For purposes of §60.5397a, a “modification” to a well site occurs when: [§60.5365a(i)(3)]*

- (i) A new well is drilled at an existing well site;*
- (ii) A well at an existing well site is hydraulically fractured; or*
- (iii) A well at an existing well site is hydraulically refractured.*

### **Affected Facility – Compressor Stations**

*Any permanent combination of one or more compressors that move natural gas at increased pressure through gathering or transmission pipelines, or into or out of storage. This includes, but is not limited to, gathering and boosting stations and transmission compressor stations. The combination of one or more compressors located at a well site, or located at an onshore natural gas processing plant, is not a compressor station for purposes of §60.5397a [§60.5430a].*

*For purposes of §60.5397a, a “modification” to a compressor station occurs when: [§60.5365a(j)]*

- (1) An additional compressor is installed at a compressor station; or*
- (2) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of §60.5397a.*

### **Reporting Requirements**

- A. For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section. [§60.5420a(b)(7)]*
  - (i) Date of the survey.*
  - (ii) Beginning and end time of the survey.*
  - (iii) Name of operator(s) performing survey. If the survey is performed by optical gas imaging, you must note the training and experience of the operator.*
  - (iv) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.*
  - (v) Monitoring instrument used.*
  - (vi) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.*
  - (vii) Number and type of components for which fugitive emissions were detected.*
  - (viii) Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h).*
  - (ix) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.*
  - (x) The date of successful repair of the fugitive emissions component.*
  - (xi) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.*
  - (xii) Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any affected collection of fugitive emissions components at a well site or compressor station during the reporting Period at its Colorado assets.**

## VIII. Pneumatic Pump Affected Facilities [§60.5420a(b)(8)]

### Affected Facility

*For natural gas processing plants, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump.*

*For well sites, each pneumatic pump affected facility, which is a single natural gas-driven diaphragm pump. A single natural gas-driven diaphragm pump that is in operation less than 90 days per calendar year is not an affected facility under this subpart provided the owner/operator keeps records of the days of operation each calendar year and submits such records to the EPA Administrator (or delegated enforcement authority) upon request. For the purposes of this section, any period of operation during a calendar day counts toward the 90 calendar day threshold. [§60.5365a(h)].*

### Reporting Requirements

*For each pneumatic pump that is constructed, modified or reconstructed during the reporting period, you must provide certification that the pneumatic pump meets one of the conditions described in paragraphs (b)(8)(i)(A), (B) or (C) of this section [§60.5420a(b)(8)(i)].*

*(A) No control device or process is available on site.*

*(B) A control device or process is available on site and the owner or operator has determined in accordance with §60.5393a(b)(5) that it is technically infeasible to capture and route the emissions to the control device or process.*

*(C) Emissions from the pneumatic pump are routed to a control device or process. If the control device is designed to achieve less than 95 percent emissions reduction, specify the percent emissions reductions the control device is designed to achieve.*

*For any pneumatic pump affected facility which has been previously reported as required under paragraph (b)(8)(i) of this section and for which a change in the reported condition has occurred during the reporting period, provide the identification of the pneumatic pump affected facility and the date it was previously reported and a certification that the pneumatic pump meets one of the conditions described in paragraphs (b)(8)(ii)(A), (B) or (C) or (D) of this section [§60.5420a(b)(8)(ii)].*

*(A) A control device has been added to the location and the pneumatic pump now reports according to paragraph (b)(8)(i)(C) of this section.*

*(B) A control device has been added to the location and the pneumatic pump affected facility now reports according to paragraph (b)(8)(i)(B) of this section.*

*(C) A control device or process has been removed from the location or otherwise is no longer available and the pneumatic pump affected facility now report according to paragraph (b)(8)(i)(A) of this section.*

*(D) A control device or process has been removed from the location or is otherwise no longer available and the owner or operator has determined in accordance with §60.5393a(b)(5) through an engineering evaluation that it is technically infeasible to capture and route the emissions to another control device or process.*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any pneumatic pump affected facilities during the reporting period at its Colorado assets.**

*A. Records of deviations specified in §60.5420 a(c)(16)(ii) that occurred during the reporting period [§60.5420a(b)(8)(iii)]*

**Not applicable. COLORADO RIVER DEVCO LLP did not have any pneumatic pump affected facilities during the reporting period at its Colorado assets.**